



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

September 7, 2021

**By ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *New York v. Mayorkas, et al.*, No. 20 Civ. 1127 (JMF) (S.D.N.Y.)  
*Lewis-McCoy, et al. v. Mayorkas, et al.*, No. 20 Civ. 1142 (JMF) (S.D.N.Y.)

Dear Judge Furman:

This Office represents the defendants in the above-referenced actions. We write jointly with the plaintiffs, and in accordance with the Court's August 6, 2021 order, Dkt. No. 152,<sup>1</sup> to provide the Court with an update on the parties' settlement discussions. Since our last status report, *see* Dkt. No. 151, the parties have continued to discuss the possibility of a consensual resolution of these matters. We have now reached settlements in principle in both matters and are currently discussing the final terms of our agreements. Accordingly, all parties respectfully request additional time to discuss settlement and propose to file a joint status letter informing the Court of our progress by October 8, 2021.

We thank the Court for its attention to this matter.

Respectfully submitted,

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<sup>1</sup> Docket numbers refer to the docket of *New York v. Mayorkas*, No. 20 Civ. 1127 (JMF) (S.D.N.Y.).